

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:19-CV-11463-DJC

JAMES LACROIX, RENEE PAYNE-CALLENDER, THE BOSTON POLICE PATROLMEN'S ASSOCIATION, THE BOSTON POLICE DETECTIVES BENEVOLENT SOCIETY, and THE BOSTON POLICE SUPERIOR OFFICERS FEDERATION,
Plaintiffs,

v.

THE BOSTON POLICE DEPARTMENT,
Defendant.

JOINT MOTION TO AMEND SCHEDULING ORDER

Plaintiffs, James LaCroix, Renee Payne-Callender, the Boston Police Patrolmen's Association, the Boston Police Detectives Benevolent Society, and the Boston Police Superior Officers Federation, and Defendant, the Boston Police Department (collectively, the "Parties"), hereby move this Court to amend the scheduling order as follows:

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Fact Discovery:	March 21, 2021	April 21, 2021
Requests for Admission:	March 21, 2021	April 21, 2021
Status Conference	February 22, 2021	April 26, 2021
Motions for Summary Judgment:	April 1, 2021	May 21, 2021

In support of this Motion, the Parties submit the following:

1. In this action, Plaintiffs allege that the Department has violated the Americans with Disabilities Act by requiring return to work physical and psychological examinations of sworn officers.
2. The Parties have been working collaboratively to complete paper discovery and depositions; however, due to scheduling concerns and the COVID-19 pandemic, the Parties anticipate needing an additional month to complete written discovery and depositions.
3. This is the Parties' first request to amend the scheduling order, and no party's rights will be prejudiced if this Court allows the Parties' request.

WHEREFORE, the Parties respectfully request that the deadlines be extended as set forth above.

Dated: February 3, 2021

Respectfully submitted,

JAMES LaCROIX and BPPA,
By their counsel,
/s/ Bryan Decker

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CERTIFICATE OF SERVICE

I, Winifred B. Gibbons, hereby certify that a true copy of the above document has been served upon all registered parties via this court's electronic filing system and upon all non-registered parties via first class mail.

Date: February 3, 2021

/s/ Winifred B. Gibbons